

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

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BLACK LOVE RESISTS IN THE RUST, et al.,

Plaintiffs,

Case No. 1:18-cv-719

- vs -

CITY OF BUFFALO, N.Y., et al.,

Defendants.

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PLAINTIFFS' NOTICE OF MOTION TO COMPEL DEFENDANTS TO PRODUCE
BUFFALO POLICE DEPARTMENT INTERNAL AFFAIRS DIVISION FILES

PLEASE TAKE NOTICE that Plaintiffs will move this Court, pursuant to Federal Rules of Civil Procedure 37(a)(3)(B)(iii) & (iv), on a return date to be determined by the Court, for an Order compelling Defendants to produce certain Buffalo Police Department (BPD) Internal Affairs Division (IAD) files regarding citizen complaints about (i) BPD checkpoints, (ii) racial profiling, bias and discrimination by BPD, and (iii) BPD traffic stop, traffic ticketing and other traffic enforcement practices.

In support of this motion, Plaintiffs file a Memorandum of Law in Support of the Motion to Compel and the Declaration of Darius Charney, with accompanying exhibits. Plaintiffs affirm that they have in good faith conferred in an effort to obtain relief without court action but were not successful in doing so.

Pursuant to Local Rule 7(a)(1), Plaintiffs hereby state that they intend to file and serve reply papers. Pursuant to Local Rule 7(b)(2)(B), if the Court does not set deadlines by order, any

opposition will be due within fourteen days of today, and any reply papers will be due within seven days of the filing of opposition papers.

Dated: August 30, 2019

Respectfully submitted,

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